

EXHIBIT C
TO DECLARATION OF MICHAEL N. EDELMAN
IN SUPPORT OF PLAINTIFF ADVANCEME, INC.'S
MOTION FOR SANCTIONS
AGAINST DEFENDANT FIRST FUNDS, LLC

Paul Hastings
ATTORNEYS

Paul, Hastings, Janofsky & Walker LLP
Five Palo Alto Square • Sixth Floor • Palo Alto, CA 94306-2155
telephone 650 320 1800 • facsimile 650 320 1900 • www.paulhastings.com

Atlanta
Beijing
Brussels
Chicago
Hong Kong
London
Los Angeles
Milan
New York
Orange County
Palo Alto
Paris
San Diego
San Francisco
Shanghai
Stamford
Tokyo
Washington, DC

(650) 320-1836
shanceewilliams@paulhastings.com

July 25, 2007

34717.00007

VIA E-MAIL

Joseph D. Gray
Vinson & Elkins LLP
2801 Via Fortuna, Suite 100
Austin, Texas 78746-7568

Re: *AdvanceMe, Inc v. AmeriMerchant et al.*, Case No. 6:06-CV-00082 (E.D. Tex)

Dear Mr. Gray:

As you know, AdvanceMe is in the process of preparing a number of deposition notices and subpoenas for service in the above-entitled action relating to the infringement claim against First Funds. Further, First Funds is under Court order to produce all documents that are relevant to this litigation, including all documents within the more than 80 categories of documents identified in Mr. Matz's July 12, 2006 letter to First Funds.

It will not be possible for AdvanceMe to complete the soon-to-be-noticed depositions unless First Funds immediately complies with the Court's order, including the production of all relevant and responsive documents in the possession of its witnesses. Accordingly, in addition to producing the Court-ordered documents this week, we need First Funds to specifically confirm that all relevant or responsive documents in the possession of all First Funds employees, officers, directors, or owners have been produced, including but not limited to all such documents in the possession or files of the following individuals: Jay Cohen, Sarah Krieger, Jahee Yang, John Weigand, Greg Kular, Phillip Head, Krissy Burkey, Global Cash Direct, Ready Funds, Inc., Fast Capital LLC, First Premier Bank, Verus Card Services, Acies, Inc., Electronic Merchant Systems, Merchant Processing Services Corp., TX Direct, IRN Payment Systems, Merchants Choice Card Services, iPayment, Power Pay, and Global Payment Systems.

In addition, from a review of the deposition testimony of Cortes DeRussy, we are aware that Jay Cohen and/or First Funds has organized a separate entity called First Funds 2006 LLC, which we believe is directly relevant to the accused cash advance programs. Indeed, it appears as if First Funds 2006 LLC was designed, at least partially, to hold proceeds from First Funds' operations. Accordingly, First Funds' production must include all documents concerning First Funds 2006 LLC, including but not limited to the organization, function, operation, revenue, and bank accounts of that entity.

Paul Hastings

VIA E-MAIL
Joseph Gray
July 25, 2007
Page 2

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, reading "Shanée Y. Williams".

Shanée Y. Williams
for Paul, Hastings, Janofsky & Walker LLP

LEGAL_US_W # 56731046.1